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We support the Alliance for Community Media's petition to waive the registration and certification requirement of the closed captioning rules for PEG producers.

We are an active community media arts center located in Western Massachusetts. We run a wide variety of programs and projects, including a community journalism program, a collaborative project with our planning department and school department to recreate our city in the tool/game Minecraft, a film festival, and co-founders of the Public VR Lab, which provides the public with access to tools, resources, education, and experience inside of virtual and augmented reality. Our 25 cameras are checked out fully on most weekends. Last year we averaged 3515 unique visits to our web sites a day, averaged 3612 plays of our online videos a week - and we exist in a community of only 28,000 people.

In the last year, our organization has worked with over 600 separate individuals who produced PEG programming, many of whom represent community organizations. Each summer we run a project called Crowdsourced Cinema that empowers people to become educated around media production and lowers the barriers to them identifying as creative makers. The project remakes a famous feature film by crowdsourcing 1-2 minute scenes of that film out to small community teams. They are stitched together and, in the end, we remake an entire blockbuster film in our own community style. The project runs for months, involves a host of community organizations, neighbors, families, and students which last year included 45 teams and over 200 participants.

Requiring community members who use our channels to register with the FCC and certify that they are exempt from captioning requirements would be cumbersome and a deterrent for many producers to use the channels and us as a resource. We are a vibrant part of our community and much of our success comes from eliminating barriers to the community engaging and participating with us. In a best case scenario our small city alone would generate a constant stream of producers that would require registration help from ourselves and the FCC.

This is especially the case because our channel is exempt from the captioning requirement because of our yearly revenue, which falls below \$3 Million per channel. While we appreciate

the consumer feedback the registration process will generate, we do not believe that registering PEG access producers on exempt channels will help consumers.

We appreciate the Commission's prompt action in the matter.

Thank you.

Peter Albert Williams  
Executive Director  
Northampton Community Television